

**DUNNELL TELEPHONE COMPANY INC.**

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DANIEL C. NELSON
GENERAL MANAGER**Date: September 17, 2008**

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

RE: EB Docket No. 06-36, Certification of CPNI Filing - Calendar Year 2007

Dear Ms. Dortch:

This letter serves as the below-named Company's "Certification of CPNI Filing for Calendar Year 2007," as ordered in EB Docket No. 06-36.

Company Name: Dunnell Telephone Company**Address: 123 Seeley Avenue, PO Box 42, Dunnell, MN 56127****Form 499 Filer ID: 804624_____****Name and Title of Signatory: Daniel C. Nelson, President and General Manager**

I, Daniel C. Nelson, certify that I am an officer of the Company named above, and that, based on my personal knowledge and acting as an agent for the Company, the Company has established operating procedures that are adequate to ensure compliance with the rules established by the Federal Communications Commission ("FCC") concerning Customer Proprietary Network Information ("CPNI"), as set forth in Part 64, Subpart U, of the FCC's Rules and Regulations, 47 C.F.R. § 64.2001 et seq., as revised.

The attached Statement demonstrates such compliance.

If the Company had not taken any action (proceedings instituted or petitions filed by the Company at state commissions, the court system or the FCC) against data brokers in the past year.

The Company has not received any customer complaints in the past year concerning unauthorized release of CPNI.

Daniel C. Nelson, as President and General
Manager of Dunnell Telephone Company

Dated: September 17, 2008

**DUNNELL TELEPHONE COMPANY
2007 CPNI CERTIFICATION
STATEMENT OF COMPLIANCE**

The operating procedures of Dunnell Telephone Company ensure compliance with the FCC's CPNI Rules. Such procedures are as follows:

Our company does not use CPNI in any of its marketing efforts, and does not permit the use of, or access to, customer CPNI by our affiliates or any third parties. We use, disclose or permit access to CPNI only for the purposes permitted under 47 U.S.C. Sections 222(c)(1) and (d).

Our company has designated a compliance officer to maintain and secure the company's CPNI records and to supervise training of all company employees.

Our company trains its personnel as to when they are, and are not, authorized to use or disclose CPNI, and we have an express disciplinary process in place if the rules are violated.

Our company authenticates the identity of a customer prior to disclosing CPNI based on a customer-initiated telephone contact, online account access, or in-store visit.

Our company discloses call detail information (CDI) in a customer-initiated call only after the customer provides a pre-established password, or, at the customer's request, by sending the CDI to the customer's address of record; or by calling back the customer at his or her telephone number of record.

Our company discloses CPNI to a customer in person at our retail location only when the customer presents a valid photo ID and the ID matches the name on the account.

Our company is prepared to notify the U.S. Secret Service and FBI within seven business days after the occurrence of an intentional, unauthorized (or exceeding authorization), access to, use of, or disclosure of CPNI. We may also notify the customer of such breach, after consulting with the investigatory agency(ies), if we believe there is an extraordinarily urgent need to notify a customer (or class of customers) in order to avoid immediate or irreparable harm. We will notify the customer of the breach after 7 business days following notification to the FBI and Secret Service, if such agencies have not requested that we postpone disclosure to the customer.

Our company will maintain records of any discovered breaches, notices to the Secret Service and FBI, and their responses, for at least two years.